

5544 BSP WB179

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|---------------------------------|---|-------------------------------------|
| KIMIKO SUZUE, as Special |) | |
| Administrator for the ESTATE OF |) | |
| GINZABURO SUZUE, deceased, |) | |
| |) | Case No. 19 CV 2156 |
| Plaintiff, |) | |
| v. |) | Honorable Charles P. Kocoras |
| |) | |
| ANTHONY BAUMGART and JOHN |) | Magistrate Judge Sheila M. Finnegan |
| BAUMGART, |) | |
| |) | |
| Defendants. |) | |

DEFENDANTS' RULE 26(a)(2)(C) DISCLOSURES

NOW COME Defendants, ANTHONY BAUMGART and JOHN BAUMGART, by and through their attorneys, PURCELL & WARDROPE, CHTD. and for their Rule 26(a)(2)(C) disclosures, state as follows:

**Mundelein Police Department Police Officers, including:
Peter Ahern, Crash Reconstruction Officer
Officer Israel Hernandez
Officer Jacob Vekemans
Officer Eric Chrabot
Officer Phil Rathke
221 N Lake St.
Mundelein, IL 60060**

These witnesses are expected to testify and render opinions regarding the occurrence identified in the pleadings ("Occurrence") based on their knowledge, skill, experience, training and education as police officers and their investigation of the Occurrence. They are expected to testify regarding their knowledge of, observation of, and familiarity with the scene, before and after the Occurrence; their knowledge and observation of the scene, objects involved in the Occurrence, evidence, parties and witnesses; their conversations with and statements taken from parties and/or witnesses at the scene and in follow up interviews and conversations; their investigation of the Occurrence and any conclusions and/or opinions formulated as a result. They are expected to testify regarding the contents of the police report and consistent with all testimony given at their discovery depositions, if taken.

Major Crash Assistance Team of Lake County members, including:
Deputy Commander Adam M. Hyde, Lincolnshire Police Department
Officer Brian Foster, Deerfield Police Department
Officer Michelle Hernandez, Round Lake Police Department
Officer Steven Flasch, Lindenhurst Police Department
Sergeant Andrew Gillespie, Vernon Hills Police Department
Officer Peter Ahern, Mundelein Police Department
Officer Eric Chrabot, Mundelein Police Department
Officer Scott Clark, Mundelein Police Department
Officer Steve Sandacz, Round Lake Beach Police Department
Reserve Deputy Stan Taylor, Lake County Sheriff Department

These witnesses are expected to testify and render opinions regarding the Occurrence identified in the pleadings based on their knowledge, skill, experience, training and education as police officers, traffic reconstruction specialists, and members of the Major Crash Assistance Team of Lake County, and their investigation of the Occurrence. They are expected to testify regarding their knowledge of, observation of, and familiarity with the scene, before and after the Occurrence; their knowledge and observation of the scene, objects involved in the Occurrence, evidence, parties and witnesses; their conversations with and statements taken from parties and/or witnesses at the scene and in follow up interviews and conversations; and their investigation of the Occurrence and any conclusions and/or opinions formulated as a result. They are expected to testify regarding the contents of the Major Crash Assistance Team Report and consistent with all testimony given at their discovery depositions, if taken.

Mundelein Fire Department EMS personnel, including:
Ed Anderson
Brian Haag
Ryland Marchionni
Scott Huber
Walter Prestel
Dave Myers
Gil Rubio
Matthew Carey
Steven D'Incognito
Kevin Miller
1000 N. Midlothian Rd.
Mundelein, IL 60060

These witnesses are expected to testify and render opinions based on their background, training, education and experience as fire fighters and emergency medical technicians, and their care and treatment of decedent Ginzaburo Suzue after the Occurrence. They are expected to testify regarding their care, treatment, assessment and prognosis of the decedent following the Occurrence; the subject matter identified in the Mundelein Fire Department EMS records, examinations, notes and correspondence relating to the care, treatment assessment and prognosis

of the decedent; their knowledge of treatment rendered to the decedent by other medical treaters; and consistent with any testimony given at their discovery deposition.

**Dr. Valerie Schmidt
Advocate Condell Medical Center
801 S. Milwaukee Ave.
Libertyville, IL 60048
c/o Marc Benjoya
Cassiday Schade LLP
1870 Winchester Rd., Suite 148
Libertyville, IL 60048**

Dr. Schmidt is expected to testify and render opinions based on her background, training, education and experience, and her care and treatment of decedent Ginzaburo Suzue after the Occurrence. Dr. Schmidt is expected to testify regarding her care, treatment, assessment and prognosis of the decedent following the Occurrence; the subject matter identified in the medical records, films, examinations, notes and correspondence relating to her care, treatment assessment and prognosis of the decedent; her knowledge of treatment rendered to the decedent by other medical treaters; and consistent with any testimony given at her discovery deposition.

Respectfully submitted,

s/Amy E. Frantz
Amy E. Frantz
Bradford S. Purcell
Attorneys for Defendants

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